



OFFICE OF THE CITY CLERK

REPORT

REPORT TO THE HONORABLE MAYOR AND CITY COUNCIL

DATE: MARCH 30, 1998

REPORT NO: 98-05

SUBJECT: PROPOSED AMENDMENTS TO THE SAN DIEGO MUNICIPAL
ADVOCATES (MUNICIPAL LOBBYING) ORDINANCE

ISSUE

The Registration of Municipal Advocates Ordinance (Chapter II, Article 9, Division 1 of the San Diego Municipal Code) was first adopted in August 1973. The ordinance has remained substantially unchanged since that time, with the exception of an amendment to one section in 1979. Because of ongoing concerns about the efficacy of the ordinance, the Rules Committee asked the City Clerk and City Attorney to review and revise it.

A proposed lobbying ordinance was discussed by the Rules Committee on February 2, and March 23, 1998. At the meeting on February 2, the main provisions of the ordinance were approved, and the Clerk was directed to change the phrase "Legislative Action" to another phrase that would more accurately reflect the decisions included in this definition. That phrase has been changed to "Municipal Decision." The Clerk was also directed to consider several other issues. The Clerk's proposals and the reasons for them were included in the Clerk's Report No. 98-04, and discussed at the Rules Committee meeting on March 23. At that time, the Clerk was directed to include provisions for reporting Compensation received by Lobbyists, and to provide for a cost of living adjustment (COLA) for the registration threshold. The proposed ordinance reflects the changes and additions directed by the Rules Committee.

RECOMMENDATION

Adopt the proposed Municipal Lobbying ordinance. This ordinance repeals SDMC Chapter 2, Article 9, Division 1 "Registration of Municipal Advocates," and creates a new "Municipal Lobbying" Division as a part of Chapter 2, Article 7.

DISCUSSION

Throughout the years it has become apparent to the Clerk and to enforcement authorities that clarification of the Municipal Advocates Ordinance is needed in order to ensure compliance. Of particular concern has been the need to clarify registration and reporting criteria for advocates, and to establish enforceable penalties for advocates who violate the requirements of the ordinance.

In response to direction from the Rules Committee to review and re-draft the ordinance, a Municipal Lobbying Ordinance Task Force was formed to analyze it for needed changes. The Task Force reviewed the existing ordinance extensively, and compared it with California's lobbying laws, as well as the lobbying ordinances of several cities across the country. The attached draft contains what the Task Force considers to be the key elements of a new Municipal Lobbying Ordinance. The main provisions are discussed below.

Although certain elements of the existing Municipal Advocates Ordinance have been retained in the proposed draft, it has been so thoroughly revised that it should be considered as a new ordinance. A chart comparing the existing and proposed ordinance is provided as Attachment A, and the proposed registration and reporting forms are provided as Attachment B.

PROPOSED AMENDMENTS

Title of Ordinance

The title of the ordinance is changed from "Registration of Municipal Advocates" to "Municipal Lobbying Ordinance."

Definitions

Many terms in the ordinance are changed to more accurately reflect the meaning intended. (Please note that the first letter of all terms defined in the ordinance are capitalized in this report and the attachments).

In the proposed ordinance **Lobbying** is defined as Direct Communication with a City Official for the purpose of Influencing a Municipal Decision on behalf of any other Person.

A **Lobbyist** is defined as an individual who receives or becomes entitled to receive the threshold Compensation amount during any calendar quarter for Lobbying. Lobbyists include in-house employees who engage in Lobbying as well as persons under contract to engage in Lobbying. Compensation earned for time spent on activities such as monitoring a Municipal Decision the Lobbyist is seeking to influence, preparing testimony, attending hearings, and conferring with Clients is included for the purpose of determining whether a Lobbyist has met the threshold for registration.

The threshold Compensation amount for 1998 is \$1,000. This threshold will be adjusted annually, based on the San Diego Consumer Price Index percentage change, and will be published by the City Clerk on or before January 10 of each year.

Direct Communication includes talking to or corresponding with a City Official, but does not include solely responding to questions from any City Official, or appearing as a speaker or providing written statements which become part of the record of a Public Hearing.

Municipal Decision includes the drafting, introduction, consideration, reconsideration, adoption, defeat or repeal of any ordinance or resolution; the amendment of any ordinance or resolution; a report by a City Official to the City Council or a City Council Committee; contracts; and quasi-judicial decisions. **Municipal Decision** does not include requests for advice or interpretation of laws or regulations, ministerial actions, or actions relating to collective bargaining agreements between the City and a recognized employee organization, or a proceeding before the Civil Service Commission.

City Official is defined to include elected or appointed City officeholders, including any City officeholder elected but not yet sworn in; City employees; City Board members; and consultants required to file statements of economic interest pursuant to any conflict of interest code adopted by the City Council.

City Board includes any board, commission, committee, or task force of the City established by action of the City Council under authority of the City Charter, Municipal Code or Council resolution. Not included in the definition are boards of directors or employees of City agencies that are nonprofit corporations of which the City is the only member; Housing Commissioners or Housing Commission employees.

Registration Requirements

The proposed ordinance requires Lobbyists to register within ten calendar days of qualifying. It eliminates volunteers from the definition of Lobbyists, and establishes a monetary threshold for qualification.

Under the provisions of the ordinance, the registrations of Lobbyists would terminate annually on January 5 of the following calendar year and be renewed on or before January 15.

Registration requirements include identifying information about the Lobbyist, disclosure of Clients, and the proposed Municipal Decision the Lobbyist is employed to support or oppose.

Registration Fees

The ordinance establishes registration fees for Lobbyists. Proposed fees are forty dollars (\$40) per Lobbyist and fifteen dollars (\$15) per Client. These fees are based on a cost recovery estimate of the staff time required to administer the ordinance.

Quarterly Reports

The ordinance requires any Person who qualifies as a Lobbyist to file quarterly disclosure reports. These reports include a list of Clients represented during the quarter and the Municipal Decision(s) for which the Lobbyist represented each Client; total Compensation received during the reporting period in connection with Lobbying, itemized by Client, and reported using the following ranges: [] \$0-\$5,000, [] \$5,000-\$25,000, [] \$25,000-\$50,000, [] Over \$50,000; an itemization of Activity Expenses of \$10 or more on any one occasion; an itemization of Activity Expenses aggregating \$50 or more during the quarter to benefit any one City Official on behalf of any one Client; a total of all Activity Expenses for the quarter; the name(s) of the Client(s) on whose behalf the expenses were made; and the name(s) of the City Official(s) benefitting from the expense. The ordinance requires the Lobbyist to sign and verify the disclosure report under penalty of perjury.

Attorney Exemption

A change in state law in the fall of 1994 allows cities to require attorneys acting as Lobbyists to register and disclose like other Lobbyists. Thus, the proposed ordinance eliminates the broad exemption for attorneys contained in the existing Municipal Advocates Ordinance and regulates attorneys when they are acting as Lobbyists.

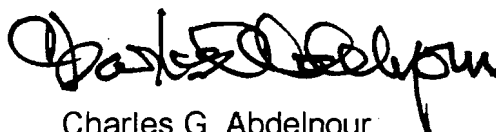
Late Filing Penalties

The ordinance establishes late filing penalties of \$25 per day for each day a report is late, up to a maximum of \$500.

CONCLUSION

In conclusion, the Clerk and the Municipal Lobbying Ordinance Task Force propose the attached re-drafted lobbying ordinance to update and clarify San Diego's Lobbying laws.

I look forward to your consideration of these proposals. Should you have any questions, please contact Deputy Director Joyce Lane at extension 34024.



Charles G. Abdelnour
City Clerk

CGA:JL
Attachments

A COMPARISON OF KEY PROVISIONS OF THE CURRENT MUNICIPAL ADVOCACY ORDINANCE AND THE PROPOSED LOBBYING ORDINANCE

DEFINITIONS:

Current Law

Advocacy is defined as any nonpublic contact with a municipal official for the purpose of attempting to influence action taken on any municipal decision.

Advocacy does not include contacts consisting solely of speaking at public meetings before the Council, where disclosure becomes a public record.

A **Municipal Advocate** is anyone who engages for pay or for any consideration for the purpose of advocacy, or who is a member of a volunteer public interest group or organization, who, without pay, engages in advocacy.

Proposed Ordinance

Lobbying is defined as Direct Communication with a City Official for the purpose of Influencing a Municipal Decision on behalf of any other Person.

Direct Communication includes talking to or corresponding with a City Official.

Direct Communication does not include solely responding to questions from any City Official, or appearing as a speaker or providing written statements which become part of the record of a Public Hearing.

A **Lobbyist** is an individual who receives or becomes entitled to receive the threshold Compensation amount during any calendar quarter for Lobbying.

Lobbyists include in-house employees who engage in Lobbying as well as persons under contract to engage in Lobbying. Compensation earned for time spent on activities such as monitoring a Municipal Decision the Lobbyist is seeking to influence, preparing testimony, attending hearings, and conferring with Clients is included for the purpose of determining whether a Lobbyist has met the threshold for registration.

Municipal decision means any discretionary action taken or which may be taken by any municipal official on any matter within the scope and course of his employment, position or official jurisdiction.

A **Municipal Official** is any person in the service of the City of San Diego whose position involves the exercise of discretion in formulating and rendering municipal decisions. The term "municipal official" also includes members of all boards, commissions and committees established by action of the Council pursuant to the authority of the Charter and Municipal Code.

The threshold Compensation amount for 1998 is \$1,000. This threshold will be adjusted annually based on the San Diego Consumer Price Index percentage change, and will be published by the City Clerk on or before January 10 of each year.

Municipal Decision includes the drafting, introduction, consideration, reconsideration, adoption, defeat or repeal of any ordinance or resolution; the amendment of any ordinance or resolution; a report by a City Official to the City Council or a City Council Committee; contracts; and quasi-judicial decisions.

A **City Official** includes any elected or appointed City Officeholder, including any City Officeholder elected but not yet sworn in; City employee; City Board member; and any consultant of the City required to file a statement of economic interests pursuant to a conflict of interest code adopted by the City Council.

City Board includes any board, commission, committee, or task force of the City established by action of the City Council under authority of the City Charter, Municipal Code or Council resolution. It does not include boards of directors or employees of City agencies that are nonprofit corporations of which the City is the only member. It also does not include Housing Commissioners or Housing Commission employees.

REGISTRATION:Current Law

Municipal Advocates must register with the City Clerk within ten (10) calendar days of engaging in advocacy.

Registration remains in full force until such time as the advocate notifies the City Clerk of the termination of such status.

There are no registration fees under the current ordinance.

Proposed Ordinance

Lobbyists must register with the City Clerk within ten (10) calendar days of qualifying as Lobbyists.

Registrations terminate annually on January 5 and may be renewed on or before January 15.

The ordinance establishes a registration fee for Lobbyists. Proposed fees are forty dollars (\$40) per Lobbyist plus fifteen dollars (\$15) per Client.

REGISTRATION DISCLOSURE:Current Law

Registration requirements include identifying information about the municipal advocate, disclosure of persons directing advocacy activities and real parties in interest being represented, and the nature and category of municipal decisions the advocate was employed or volunteered to support or oppose.

No time frame is provided for amendments to registration.

Proposed Ordinance

Registration requirements include identifying information about the Lobbyist, and disclosure of Clients and the proposed Municipal Decision the Lobbyist is employed to support or oppose.

Lobbyists are required to file amendments to their registration forms with the next quarterly report.

QUARTERLY REPORTS:

Current Law

Under current law the quarterly filing requirement is not mandatory.

Quarterly reports consist of disclosure of decisions the advocate is or was employed or had volunteered to support or oppose; the name and identifying information of each person who made contributions of \$100 or more; expenditures of \$25 or more made on any one occasion or expenditures on behalf of the principal which total \$100 or more in any quarter.

ATTORNEY EXEMPTION:

Current Law

Current law provides a broad exemption for "Members of the State Bar of California acting on behalf of a client or clients in an attorney-client relationship while performing a duty or service, which duty or service can be performed lawfully only by an attorney licensed to practice law in California...."

Proposed Ordinance

The ordinance requires any Person who qualifies as a Lobbyist to file quarterly reports.

Quarterly reports include a list of all Clients represented during the quarter and the Municipal Decision(s) for which the Lobbyist represented each Client; total Compensation received during the reporting period in connection with Lobbying, itemized by Client, and reported using the following ranges: \$0-\$5,000, \$5,000-\$25,000, \$25,000-\$50,000, over \$50,000; an itemization of Activity Expenses of \$10 or more on any one occasion; an itemization of Activity Expenses aggregating \$50 or more during the quarter to benefit any one City Official on behalf of any one Client; a total of all Activity Expenses for the quarter; the name(s) of the Client(s) on whose behalf the expenses were made; and the name(s) of the City Official(s) benefitting from the expense.

Proposed Ordinance

The proposed ordinance provides no exemption for attorneys. It regulates attorneys when they are acting as Lobbyists.

LATE FILING PENALTIES:**Current Law**

There are no late filing penalties under current law.

Proposed Ordinance

The ordinance establishes late filing penalties of \$25 per day for each day a report is late, up to a maximum of \$500.

CITY OF SAN DIEGO LOBBYIST REGISTRATION FORM

Type or Print in Ink. File Original with City Clerk.

☐ Check Box if an Amendment

If this is an Initial Registration, enter

DATE QUALIFIED as a Lobbyist: _____

Amount of Registration Fees due with Registration

(see SDMC Section 27.4010): _____

For Official Use Only

FULL NAME OF LOBBYIST:

BUSINESS PHONE NUMBER:
()

BUSINESS ADDRESS: (Number and Street)

(City)

(State)

(ZIP)

MAILING ADDRESS: (If different from above)

LOBBYIST'S EMPLOYER:

BUSINESS PHONE NUMBER:
()

EMPLOYER'S BUSINESS ADDRESS: (Number and Street)

(City)

(State)

(ZIP)

NATURE AND PURPOSE OF EMPLOYER'S BUSINESS:

VERIFICATION

By signing the verification below, I certify that I have reviewed and understand the requirements of Division 40, "Municipal Lobbying," of the San Diego Municipal Code.

I have used all reasonable diligence in preparing this Registration. I have reviewed this Registration and to the best of my knowledge the information contained herein is true and complete.

I verify under penalty of California perjury laws that the foregoing is true and correct.

Executed on _____ at _____
(date) (city and state)

By _____
(signature of lobbyist)

Name of Lobbyist: _____

CLIENT DISCLOSURE - See SDMC Section 27.4010 for fee information

CLIENT'S NAME:	BUSINESS OR MESSAGE PHONE NUMBER: ()
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CLIENT'S BUSINESS OR MAILING ADDRESS: (Number and Street) (City) (State) (ZIP)

NATURE AND PURPOSE OF CLIENT'S BUSINESS:

MUNICIPAL DECISION(S) FOR WHICH LOBBYIST WAS RETAINED TO REPRESENT CLIENT: (If no specific item(s) of Municipal Decision can be identified, describe type(s) of Municipal Decision for which Lobbyist was retained to represent Client.)

CLIENT'S NAME:	BUSINESS OR MESSAGE PHONE NUMBER: ()
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CLIENT'S BUSINESS OR MAILING ADDRESS: (Number and Street) (City) (State) (ZIP)

NATURE AND PURPOSE OF CLIENT'S BUSINESS:

MUNICIPAL DECISION(S) FOR WHICH LOBBYIST WAS RETAINED TO REPRESENT CLIENT: (If no specific item(s) of Municipal Decision can be identified, describe type(s) of Municipal Decision for which Lobbyist was retained to represent Client.)

CLIENT(S) TO BE DELETED FROM LOBBYIST'S REGISTRATION (check "Amendment" box on p. 1 of form):

NAME:

NAME:

☐ If more space is needed, check box and attach continuation sheet(s).

CITY OF SAN DIEGO LOBBYIST DISCLOSURE REPORT

Type or Print in Ink. File Original with City Clerk.

☐ Check Box if an Amendment

☐ Check Box if Terminating Status as Lobbyist

Period Covered: from _____ to _____

For Official Use Only

FULL NAME OF LOBBYIST:

BUSINESS PHONE NUMBER:

()

BUSINESS ADDRESS: (Number and Street)

(City)

(State)

(ZIP)

MAILING ADDRESS: (If different from above)

LOBBYIST'S EMPLOYER (IF APPLICABLE -- NOT CLIENT):

BUSINESS PHONE NUMBER:

()

EMPLOYER'S BUSINESS ADDRESS: (Number and Street)

(City)

(State)

(ZIP)

TOTAL AMOUNT OF ALL ACTIVITY EXPENSES MADE DURING PERIOD (SDMC §27.4017(j)): _____

☐ CHECK BOX IF NO LOBBYING ACTIVITY THIS PERIOD. [FILE THIS PAGE ONLY WITH CLERK.]

VERIFICATION

I have used all reasonable diligence in preparing this Disclosure Report. I have reviewed this Disclosure Report and to the best of my knowledge the information contained herein is true and complete.

I verify under penalty of California perjury laws that the foregoing is true and correct.

Executed on _____ at _____
(date) (city and state)

By _____
(signature of lobbyist)

NAME OF LOBBYIST: _____ Period Covered: from _____ to _____

REPRESENTATION DISCLOSURE - See SDMC Section 27.4017(c), 27.4017(d)

CLIENT'S NAME:

BUSINESS OR MESSAGE
PHONE NUMBER:
()

CLIENT'S BUSINESS OR MAILING ADDRESS: (Number and Street) (City) (State) (ZIP)

MUNICIPAL DECISION(S) FOR WHICH LOBBYIST REPRESENTED CLIENT DURING REPORTING PERIOD:

COMPENSATION FROM CLIENT: ☐ \$0-\$5,000 ☐ \$5,000-\$25,000 ☐ \$25,000-\$50,000 ☐ over \$50,000

CLIENT'S NAME:

BUSINESS OR MESSAGE
PHONE NUMBER:
()

CLIENT'S BUSINESS OR MAILING ADDRESS: (Number and Street) (City) (State) (ZIP)

MUNICIPAL DECISION(S) FOR WHICH LOBBYIST REPRESENTED CLIENT DURING REPORTING PERIOD:

COMPENSATION FROM CLIENT: ☐ \$0-\$5,000 ☐ \$5,000-\$25,000 ☐ \$25,000-\$50,000 ☐ over \$50,000

CLIENT'S NAME:

BUSINESS OR MESSAGE
PHONE NUMBER:
()

CLIENT'S BUSINESS OR MAILING ADDRESS: (Number and Street) (City) (State) (ZIP)

MUNICIPAL DECISION(S) FOR WHICH LOBBYIST REPRESENTED CLIENT DURING REPORTING PERIOD:

COMPENSATION FROM CLIENT: ☐ \$0-\$5,000 ☐ \$5,000-\$25,000 ☐ \$25,000-\$50,000 ☐ over \$50,000

CLIENT'S NAME:

BUSINESS OR MESSAGE
PHONE NUMBER:
()

CLIENT'S BUSINESS OR MAILING ADDRESS: (Number and Street) (City) (State) (ZIP)

MUNICIPAL DECISION(S) FOR WHICH LOBBYIST REPRESENTED CLIENT DURING REPORTING PERIOD:

COMPENSATION FROM CLIENT: ☐ \$0-\$5,000 ☐ \$5,000-\$25,000 ☐ \$25,000-\$50,000 ☐ over \$50,000

☐ If more space is needed, check box and attach continuation sheet(s).

NAME OF LOBBYIST: _____ Period Covered: from _____ to _____

ACTIVITY EXPENSE DISCLOSURE - see SDMC Sections 27.4017(e) - 27.4017(i)

DATE OF EXPENSE:	AMOUNT OF EXPENSE:
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NAME AND TITLE OF CITY OFFICIAL BENEFITTING FROM EXPENSE:

DESCRIPTION OF EXPENSE:

NAME AND ADDRESS OF PAYEE:	NAME OF VENDOR (if different from payee):
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CLIENT (IF ANY) ON WHOSE BEHALF EXPENSE WAS MADE:

DATE OF EXPENSE:	AMOUNT OF EXPENSE:
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NAME AND TITLE OF CITY OFFICIAL BENEFITTING FROM EXPENSE:

DESCRIPTION OF EXPENSE:

NAME AND ADDRESS OF PAYEE:	NAME OF VENDOR (if different from payee):
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CLIENT (IF ANY) ON WHOSE BEHALF EXPENSE WAS MADE:

DATE OF EXPENSE:	AMOUNT OF EXPENSE:
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NAME AND TITLE OF CITY OFFICIAL BENEFITTING FROM EXPENSE:

DESCRIPTION OF EXPENSE:

NAME AND ADDRESS OF PAYEE:	NAME OF VENDOR (if different from payee):
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CLIENT (IF ANY) ON WHOSE BEHALF EXPENSE WAS MADE:

☐ If more space is needed, check box and attach continuation sheet(s).

CITY OF SAN DIEGO LOBBYIST DISCLOSURE REPORT - ***EXPANDED***

FOR USE BY EMPLOYERS WITH MORE THAN ONE IN-HOUSE LOBBYIST. DO NOT USE FOR CONTRACT LOBBYISTS.

Type or Print in Ink. File Original with City Clerk.

☐ Check box if an Amendment

Period covered: from _____ to _____

NAME OF IN-HOUSE LOBBYIST EMPLOYER:

BUSINESS PHONE NUMBER:

()

BUSINESS ADDRESS: (Number and Street) (City) (State) (ZIP)

MAILING ADDRESS: (if different from above)

NAME OF EACH IN-HOUSE LOBBYIST (NOT ON CONTRACT) OF THE COMPANY/ORGANIZATION:
(Complete and file Form CC-1647a for each in-house lobbyist active during this period.)

	<input type="checkbox"/> inactive this period		<input type="checkbox"/> inactive this period
	<input type="checkbox"/> inactive this period		<input type="checkbox"/> inactive this period
	<input type="checkbox"/> inactive this period		<input type="checkbox"/> inactive this period
	<input type="checkbox"/> inactive this period		<input type="checkbox"/> inactive this period
	<input type="checkbox"/> inactive this period		<input type="checkbox"/> inactive this period

TOTAL AMOUNT OF ALL ACTIVITY EXPENSES MADE BY LOBBYISTS DURING PERIOD: _____

☐ CHECK BOX IF NO LOBBYING ACTIVITY BY ANY LOBBYIST THIS PERIOD. [FILE THIS PAGE ONLY WITH CLERK.]

VERIFICATION

(NOTE: VERIFICATION MUST BE SIGNED BY RESPONSIBLE OFFICER.)

I have used all reasonable diligence in preparing this Disclosure Report. I have reviewed this Disclosure Report and to all the best of my knowledge the information contained herein is true and complete.

I verify under penalty of California perjury laws that the foregoing is true and correct.

Executed on _____ at _____
(date) (city and state)

By _____
(signature of responsible officer) (title)

NAME OF LOBBYIST: _____ Period Covered: from _____ to _____

REPRESENTATION DISCLOSURE - see SDMC Section 27.4017(c), 27.4017(d)

MUNICIPAL DECISION(S) FOR WHICH LOBBYIST REPRESENTED EMPLOYER or CLIENT DURING REPORTING PERIOD:

CLIENT'S NAME (if applicable):	CLIENT'S BUSINESS/MESSAGE PHONE: ()
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CLIENT'S BUSINESS OR MAILING ADDRESS: (Number and Street) (City) (State) (ZIP)

COMPENSATION FROM CLIENT: ☐ \$0-\$5,000 ☐ \$5,000-\$25,000 ☐ \$25,000-\$50,000 ☐ over \$50,000

MUNICIPAL DECISION(S) FOR WHICH LOBBYIST REPRESENTED EMPLOYER or CLIENT DURING REPORTING PERIOD:

CLIENT'S NAME (if applicable):	CLIENT'S BUSINESS/MESSAGE PHONE: ()
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CLIENT'S BUSINESS OR MAILING ADDRESS: (Number and Street) (City) (State) (ZIP)

COMPENSATION FROM CLIENT: ☐ \$0-\$5,000 ☐ \$5,000-\$25,000 ☐ \$25,000-\$50,000 ☐ over \$50,000

ACTIVITY EXPENSE DISCLOSURE - see SDMC Sections 27.4017(e) - 27.4017(j)

DATE OF EXPENSE:	AMOUNT OF EXPENSE:
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NAME AND TITLE OF CITY OFFICIAL BENEFITTING FROM EXPENSE:

DESCRIPTION OF EXPENSE:

NAME AND ADDRESS OF PAYEE:	NAME OF VENDOR (if different from payee):
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CLIENT (IF ANY) ON WHOSE BEHALF EXPENSE WAS MADE:

DATE OF EXPENSE:	AMOUNT OF EXPENSE:
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NAME AND TITLE OF CITY OFFICIAL BENEFITTING FROM EXPENSE:

DESCRIPTION OF EXPENSE:

NAME AND ADDRESS OF PAYEE:	NAME OF VENDOR (if different from payee):
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CLIENT (IF ANY) ON WHOSE BEHALF EXPENSE WAS MADE:

TOTAL AMOUNT OF ALL ACTIVITY EXPENSES MADE BY LOBBYIST DURING PERIOD:

☐ If more space is needed to disclose this lobbyist's representation and activity expenses, check box and attach continuation sheet(s).